

BLACKBERRY LIMITED,)
)
 Plaintiff,)
)
 v.) C.A. No. 17-155-RGA
)
 NOKIA CORPORATION, NOKIA SOLUTIONS)
 AND NETWORKS OY, AND NOKIA OF) **REDACTED PUBLIC VERSION**
 AMERICA CORPORATION,)
)
 Defendants.)

Attorneys for Plaintiff BlackBerry Limited

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BLACKBERRY LIMITED,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 17-155-RGA
)	
NOKIA CORPORATION, NOKIA SOLUTIONS)	
AND NETWORKS OY, AND NOKIA OF)	
AMERICA CORPORATION,)	
)	
Defendants.)	

**DECLARATION OF W. RUDOLPH KLEYTEUBER
IN SUPPORT OF PLAINTIFF BLACKBERRY LIMITED'S
MOTION FOR PRELIMINARY INJUNCTIVE RELIEF
LIMITING ARBITRATION**

W. RUDOLPH KLEYTEUBER declares the following pursuant to 28 U.S.C. § 1746:

1. I am admitted *pro hac vice* to this Court and I am a Special Counsel at the law firm of Sullivan & Cromwell LLP, counsel of record for Plaintiff BlackBerry Limited ("BlackBerry") in this case. I make this declaration in support of BlackBerry's Motion for Preliminary Injunctive Relief Limiting Arbitration, filed contemporaneously herewith.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Patent License Agreement between Nokia Corporation and Research in Motion Limited (the predecessor in interest to BlackBerry) dated December 30, 2003 (the "2003 PLA").

3. Attached hereto as Exhibit 2 is a true and correct copy of an amendment to the 2003 PLA dated November 29, 2008.

4. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Robert Gray of Nokia to BlackBerry, dated December 23, 2013.

5. Attached hereto as Exhibit 4 is a true and correct copy of a letter from Robert Gray of Nokia to BlackBerry, dated July 11, 2018.

6. Attached hereto as Exhibit 5 is a true and correct copy of Nokia Corporation, Nokia Solutions & Networks Oy, and Nokia of America Corporation's Request for Arbitration, dated June 29, 2018.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 27th day of July, 2018.

/s/ W. Rudolph Kleysteuber
W. Rudolph Kleysteuber

EXHIBIT 1

**REDACTED IN
ITS ENTIRETY**

EXHIBIT 2

**REDACTED IN
ITS ENTIRETY**

EXHIBIT 3

**REDACTED IN
ITS ENTIRETY**

EXHIBIT 4

**REDACTED IN
ITS ENTIRETY**

EXHIBIT 5

**REDACTED IN
ITS ENTIRETY**